

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

KARIM P. NAJJAR et al.,

Plaintiffs,

v.

RIAD SALAMEH et al.,

Defendants.

Case No. 1:24-cv-05043-CPO-EAP

**STIPULATION ON SCHEDULE FOR EYG’S AND DTTL’S  
RESPONSES TO FIRST AMENDED CLASS ACTION COMPLAINT**

Plaintiffs Karim P. Najjar, Halim Abou-Faycal, Younes Bazzi, Jacques Fontaine, Mounir Jermany, Ibrahim Khreibani, Bechara Rizk, Samar Shami, Joseph Tleiji, Salim Tleiji, and Ramzi Zibaoui (collectively, “Plaintiffs”) and Defendant Ernst & Young Global Limited (“EYG”) submit this joint stipulation, by and through their undersigned counsel and pursuant to Section VIII of the Court’s Judicial Preferences. Counsel for Plaintiffs and EYG have also conferred with counsel for Defendant Deloitte Touche Tohmatsu Limited (“DTTL”), which is in the process of retaining local counsel, and DTTL also stipulates to the provisions here. EYG and DTTL (collectively, the “Stipulating Defendants”) and Plaintiffs hereby stipulate as follows:

WHEREAS, on July 24, 2024, Plaintiffs filed their First Amended Class Action Complaint [Dkt. 3] (“Complaint”) naming, among others, the Stipulating Defendants as Defendants in this action;

WHEREAS, on September 19, 2024, the Court entered a text order stating, among other things, that “[a]ny . . . party that wishes to file a motion to dismiss shall be excused from following the Court’s pre-motion conference procedure”;

WHEREAS, the Stipulating Defendants will not move to dismiss based on, or otherwise challenge, process or service of process, but each of the Stipulating Defendants preserves and has not waived any other defenses or grounds for dismissal;

WHEREAS, Plaintiffs and the Stipulating Defendants acknowledge that any motions to dismiss filed by the Stipulating Defendants likely would raise, at least among others, defenses, arguments, and issues that are similar to those that have been raised in the pending motions to dismiss already filed by Defendants BDO USA, P.C., Deloitte LLP, Deloitte & Touche LLP, and Ernst & Young U.S. LLP [Dkts. 37, 38, 39] (the “U.S. Defendants’ Motions”) such that the resolution of the U.S. Defendants’ Motions likely will affect the claims against the Stipulating Defendants;

WHEREAS, counsel for Plaintiffs and the Stipulating Defendants have met and conferred and, subject to the Court’s approval, agreed, for the sake of judicial economy and efficiency, to extend the time within which the Stipulating Defendants may answer, move to dismiss, or otherwise respond to the Complaint to allow resolution of the U.S. Defendants’ Motions; and

WHEREAS, no prior extension of time has been sought with respect to the Stipulating Defendants;

NOW, THEREFORE, Plaintiffs and the Stipulating Defendants hereby stipulate and agree, and respectfully request that the Court order, as follows:

1. The deadline for the Stipulating Defendants to answer, move to dismiss, or otherwise respond to the Complaint is stayed;
2. Within 14 days of the resolution or termination—by order, withdrawal, stipulation or otherwise—of the U.S. Defendants’ Motions, Plaintiffs and the Stipulating Defendants must meet and confer for the purpose of agreeing on a schedule for the Stipulating Defendants’

answers, motions to dismiss, or other responses to the Complaint and a schedule for any related briefing, and within 7 days thereafter, Plaintiffs and the Stipulating Defendants must submit a joint proposed schedule or, in the absence of agreement, separate proposed schedules.

**SO ORDERED**

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Hon. Christine P. O'Hearn  
United States District Judge

Dated: \_\_\_\_\_

Respectfully submitted this 6th day of February, 2025

*/s/ James E. Cecchi*

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